

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SEALED

FILED  
IN CLERKS OFFICE  
2015 APR 13 AM 10 18  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

UNITED STATES OF AMERICA, )

v. )

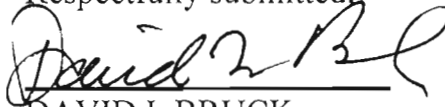
No. 13-CR10200-GAO

DZHOKHAR TSARNAEV )

**SEALED MOTION TO SEAL DEFENSE PROPOSED PRELIMINARY  
PENALTY PHASE JURY INSTRUCTIONS**

Defendant moves that this Court grant him leave to file under seal both the instant Motion and the attached Proposed Preliminary Penalty Phase Jury Instructions. In support of this motion, counsel submits that the attached instructions should be filed under seal at the discretion of the Court.

Respectfully submitted,



DAVID I. BRUCK

JUDY CLARKE

MIRIAM CONRAD

WILLIAM FICK

TIMOTHY WATKINS

Attorneys for Dzhokhar Tsarnaev

**Certificate of Service**

I certify that this document was served on counsel for the government by hand on April 13, 2015.

